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5 UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

6 TABITHA WILLIAMS, a person,

C17-1113 RSM

7  
8 Plaintiff,

9 v.

STIPULATION AND ORDER FOR 2-DAY  
EXTENSION OF DISCOVERY  
DEADLINE;

10 FOREMOST INSURANCE COMPANY  
11 GRAND RAPIDS MICHIGAN, an insurance  
company.

12  
13 Defendant.

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15 **I. STIPULATED REQUEST**

16 All parties respectfully request that the Court extend the discovery deadline for two days,  
17 to April 18, 2018, for the deposition of Rebecca Cremin.

18 **II. FACTS**

19 The parties have been working for several months to schedule the deposition of Rebecca  
20 Cremin. Ms. Cremin was John Blanchard's supervisor and was one of the employees involved in  
21 the coverage denial in this matter. Counsel for both Plaintiff and Defendant both believed that  
22 Ms. Cremin lived in Washington state and that her deposition would be relatively easy to  
23 schedule. However, counsel for Defendant later learned that she has moved to New Mexico. The  
24 parties also learned that the calendars of Ms. Cremin, Plaintiff counsel, and Defense counsel  
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1 prevented them from being available to conduct her deposition in New Mexico until the week of  
2 April 18, 2018. Accordingly, counsel for both parties have arranged travel for her deposition on  
3 April 18. Presently, the discovery deadline in this case is April 16, 2018. (Dkt. No. 10.)

4 DATED this 20<sup>th</sup> day of March, 2018.

5 JOEL B. HANSON, ATTORNEY AT LAW, PLLC

6 /s/ Joel Hanson  
7 Joel B. Hanson, WSBA #40814  
8 Attorney for Plaintiff

9 DATED this 20<sup>th</sup> day of March, 2018.

10 LETHER & ASSOCIATES, PLLC

11 /s/ Eric Neal  
12 Thomas Lether, WSBA #18089  
13 Eric J. Neal, WSBA #31863  
14 1848 Westlake Avenue N, Suite 100  
15 Seattle, WA 98109  
16 P: (206) 467-5444  
17 F: (206) 467-5544  
[tlether@letherlaw.com](mailto:tlether@letherlaw.com)  
[eneal@letherlaw.com](mailto:eneal@letherlaw.com)  
Counsel for Defendant Foremost Insurance Company  
Grand Rapids Michigan

18 **IT IS HEREBY ORDERED** this 23<sup>rd</sup> day of March that the parties' Stipulated Motion  
19 for a 2-Day Extension of the Discovery Deadline is GRANTED. The discovery deadline is moved  
20 to April 18, 2018 for the purpose of taking the deposition of Rebecca Cremin only.

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23 RICARDO S. MARTINEZ  
24 CHIEF UNITED STATES DISTRICT JUDGE  
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